

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

Jade Pig Ventures – River Ridge, LLC,

Case No: 1:24-cv-382

Plaintiff,

Honorable

-vs-

Circuit Court No: 24-02401-CH

City of Walker,

Defendant.

Michael P. Hindelang (P62900)
Brandon J. Wilson (P73042)
Laura E. Biery (P82887)
HONIGMAN, LLP
Attorneys for Plaintiff
2290 First National Building
660 Woodward Ave.
Detroit, MI 48226-3506
(313) 465-7000

Michael S. Bogren (P34835)
Charles L. Bogren (P82824)
PLUNKETT COONEY
Attorneys for Defendant
333 Bridge St. NW, Suite 530
Grand Rapids, MI 49504
(616) 752-4600
mbogren@plunkettcooney.com
cbogren@plunkettcooney.com

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN**

TO: United States District Court Judges of the Western District of Michigan

NOW COMES defendant, City of Walker, by and through its attorneys Plunkett Cooney, and pursuant to 28 U.S.C. § 1441(a) and § 1446, file this Notice of Removal based on the following:

1. On or about March 8, 2024, plaintiff filed its complaint against the City of Walker and is now pending in the Kent County Circuit Court, State of Michigan, a certain civil action, assigned case number 24-02401-CH in which Jade Pig Ventures – River Ridge, LLC, is the plaintiff; the City of Walker is the named defendant.

2. The action, as alleged in the Complaint, is a suit brought under the statutes and Constitution of the United States and the statutes and Constitution of the State of Michigan. Specifically, the plaintiff alleges a Substantive Due Process violation, an Equal Protection violation, and a takings claim in violation of the Fifth and Fourteenth Amendments of the United States Constitution relating to real property owned in the City of Walker.

3. The action filed by plaintiff is one which the District Courts of the United States would have original jurisdiction under 28 U.S.C. § 1331 as a civil action arising under the Constitution of the United States.

4. This Notice of Removal is timely filed within thirty days after the day the City of Walker acknowledged service of the summons and complaint on March 12, 2024.

5. Attached to this Notice of Removal is a copy of the Summons and Complaint stating the causes of action and claims for relief by the plaintiff against the defendants.

6. A written notice of this Notice of Removal has been given to all parties as required by law and a Proof of Service is attached.

7. A written notice of this Notice of Removal has been filed with the Clerk of the Kent County Circuit Court, State of Michigan as required by law.

WHEREFORE, the defendant requests it be allowed to affect removal of this matter from the Kent County Circuit Court, State of Michigan, to the United States District Court for the Western District of Michigan.

Respectfully submitted,

DATED: April 12, 2024

PLUNKETT COONEY

BY: /s/ Charles L. Bogren

Michael S. Bogren (P34835)

Charles L. Bogren (P82824)

Attorneys for Defendant

333 Bridge Street, NW., Suite 530

Grand Rapids, Michigan 49504

(616) 752-4600

mbogren@plunkettcooney.com

cbogren@plunkettcooney.com

Open.00560.41089.33418832-1